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6 *Department, Keith Pleich, Daniel Bond,*
7 *And Scott Rasmussen*

8 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

9 DENISE ABBEY, individually, and as special
10 administrator of the ESTATE OF MICAH ABBEY,

Case No.: 3:13-cv-00347-LRH-
VPC

11 Plaintiffs,

12 vs.

13 CITY OF RENO; RENO POLICE
14 DEPARTMENT; KEITH PLEICH individually
and in his official capacity as a Police Officer for
15 CITY OF RENO and RENO POLICE
DEPARTMENT; DANIEL BOND individually
16 and in his official capacity as a Police Officer for
17 CITY OF RENO and RENO POLICE
DEPARTMENT; SCOTT RASMUSSEN
18 individually and in his official capacity as a
Police Officer for CITY OF RENO and RENO
19 POLICE DEPARTMENT; BRAD DEMITROPOULIS;
20 And DOES through X, inclusive.

21 Defendants.
22 /

23 **DEFENDANTS JOINT CASE MANAGEMENT CONFERENCE REPORT**

24
25 The Defendants through their undersigned counsel hereby submit the following
26 Monthly Case Management Report, pursuant to the Court's Minute Order dated November 20,
27 13. (Doc #35).

28 //

Reno City Attorney
P.O. Box 1900
Reno, NV 89505

1 **1. Discovery that has been propounded**

- 2 1) The City of Reno sent its First Set of Interrogatories, which contained eight
- 3 (8) Interrogatories, and its First Set of Requests for Production of Documents
- 4 containing seven (7) Requests on November 21, 2013.
- 5 2) Defendant Brad Demitropoulos served his First Set of Interrogatories, which
- 6 contained nineteen (19) Interrogatories, and Requests for Admission, which
- 7 contained seven (7) requests on November 27, 2013.
- 8 3) Defendant University of Nevada Reno served its Request for Production,
- 9 which contained seven (7) requests on November 27, 2013.
- 10 4) The Reno Police Department sent its First Set of Interrogatories to Plaintiff
- 11 individually, which contained nineteen (19) Interrogatories on December 10,
- 12 2013.
- 13 5) The Reno Police Department sent its First Set of Interrogatories to Plaintiff as
- 14 the Administrator of Micah Abbey's estate, which contained twenty (20)
- 15 Interrogatories on December 10, 2013.
- 16 6) Defendants Keith Pleich, Scott Rasmussen, and Daniel Bond sent their First
- 17 Sets of Interrogatories to Plaintiff on December 10, 2013. Each Defendant
- 18 officer submitted three (3) Interrogatories to Plaintiff.

19 **2. Discovery that has been completed.**

20 All parties have submitted their Initial Disclosures.

21 **3. Remaining Discovery**

22 Responses to written discovery are ongoing, and as of today's date no depositions

23 have been scheduled. Defense counsel have conferred on first round depositions

24 that will be needed. On December 9, 2013, Attorney Cardinal sent an email to

25 Plaintiff's counsel regarding this Court's order to meet and confer on a deposition

26 schedule, discussed first round depositions required by the University defendants

27 and asked Plaintiff to identify requested depositions so that time requirements and

28 dates could be evaluated. As of the date of this report, no response has been

received, but Defendants do not anticipate the need for Court assistance on this issue.

4. Discovery Disputes

Defendants City of Reno, Reno Police Department, Keith Pleich, Scott Rasmussen, and Daniel Bond object to Plaintiff's documents bates stamped as ABBEY 002332-ABBEY002390. Plaintiff identified these records in her First Supplement to Initial Disclosures as Northern Nevada Mental Health Records for Micah Abbey. However, Plaintiff failed to include an Affidavit or Declaration by a Custodian of Records certifying the documents as required by FRE 803(6) and 902(11). Defendants University of Nevada, Reno and Brad Demitropoulos join in this objection.

DATED this 12th day of December, 2013

JOHN J. KADLIC
Reno City Attorney

/s/ Jack Campbell
JACK CAMPBELL, ESQ.
DEPUTY CITY ATTORNEY
1 East First Street, 3rd Floor
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*Attorney for Defendants Daniel Bond,
Keith Pleich, Scott Rasmussen, City of
Reno and Reno Police Department*

/s/ Gary Cardinal
GARY CARDINAL, ESQ.
ASSISTANT GENERAL COUNSEL
1664 N. Virginia Street/MS 0550
Reno, Nevada 89557
*Attorney for Defendants Brad
Demitropoulos and
The Nevada System of Higher Education*

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the RENO CITY ATTORNEY'S OFFICE, and that on this date, I am serving the foregoing document(s) on the party(s) set forth below by:

_____ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage prepaid, following ordinary business practices.

_____ Personal delivery.

 X CM/ECF electronic service

_____ Facsimile (FAX).

_____ Federal Express or other overnight delivery.

_____ Reno/Carson Messenger Service.

addressed as follows:

Richard Salvatore, Esq.
HARDY LAW GROUP
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Reno, NV 89557
Attorney for Brad Demitropoulos

DATED this 12th day of December, 2013.

/s/ Katie Wellman
Katie Wellman
Legal Assistant

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